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April 8, 2024

VIA ECF

Hon. Nelson S. Roman
United States District Court
Southern District of New York
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, New York 10601

Re: Ron v. Carerite Centers, LLC et al.
Case No.: 7:24-cv-00163 (NSR)

Dear Judge Roman:

We represent Defendant Cortlandt Operations, LLC d/b/a Cortlandt Healthcare (“Cortlandt”)^{1/} and Faith Levesque (“Levesque”) (collectively “Defendants”) in the above referenced matter. While we will be filing the Case Management Plan and Scheduling Order today as required, the parties jointly request, in the alternative, a referral to mandatory mediation pursuant to Second Amended Standing Administrative Order (M10-468) issued by the United States District Court for the Southern District of New York regarding counseled employment discrimination cases.

Plaintiff’s Complaint asserts employment discrimination claims under the Age Discrimination in Employment Act of 1967 (“ADEA”), the New York State Human Rights Law (“NYSHRL”), the New York Labor Law (“NYLL”), the New Jersey Law Against Discrimination (“NJLAD”), and the Conscientious Employee Protection Act (“CEPA”). Specifically, Plaintiff has alleged causes of action including age discrimination and retaliation. Accordingly, we believe this matter is eligible for SDNY’s Mediation Program.

The parties additionally request that Gazzola v. Carerite Centers, LLC et al., Case No. 7:24-cv-00054 (NSR), a second employment discrimination case asserting the same causes of action before Your Honor, also be automatically referred to the Southern District of New York’s Alternative Dispute Resolution program of mediation.

^{1/} Incorrectly named in the caption as CARERITE CENTERS, LLC d/b/a CORTLANDT HEALTHCARE (“CareRite”).

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We thank the Court for its attention to this matter.

Very truly yours,

JACKSON LEWIS P.C.

s/ David S. Greenhaus

David S. Greenhaus

DSG

CERTIFICATE OF SERVICE

I hereby certify that, on April 8, 2024, a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, the Southern District's Local Rules, and the Southern District's Rules on Electronic Service upon the following parties and participants:

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s/ David S. Greenhaus
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